

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>PURDUE PHARMA, L.P., et. al.,</b>	)	<b>Case No. 19-23649 (RDD)</b>
	)	
<b>Debtors</b>	)	<b>(Jointly Administered)</b>
	)	

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**MOTION FOR LEAVE TO FILE *AMICI CURIAE* BRIEF**

Proposed *amici curiae* Kennedy Forum, American Foundation for Suicide Prevention, Depression and Bipolar Support Alliance, The Jed Foundation, Kennedy-Satcher Center for Mental Health Equity, Mental Health America, National Alliance on Mental Illness, National Association of Addiction Treatment Providers, National Association for Behavioral Healthcare, Scattergood Foundation, and Well Being Trust (collectively “*amici*”) respectfully request leave of this Court to submit the attached *amici curiae* brief.

*Amici* are not litigants and have no direct stake in the many judicial proceedings related to the opioid epidemic.

*Amici* are nonprofit organizations concerned about the public health crisis attributable to opioid addiction.<sup>1</sup> Their proposed brief, informed by their deep experience in the field and in policy circles, urges that the Purdue Pharma bankruptcy proceeding be seen and used as an

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<sup>1</sup> No *amici* has a parent corporation. No *amici* issues stock. Hence, no publicly held corporation holds 10% or more of an *amici*’s stock.

opportunity to create and fund a national program for mental health system care reform. It also outlines key steps for implementing such a program.

*Amici* believe their proposed brief is timely and will be useful to this Court, the mediators, and the parties as they craft a plan for the debtors' assets. The attached brief explains the connection between mental health and opioid addiction and the importance of attending to the mental health system when crafting a plan for the debtors' assets.

The proposed *amici* brief does not duplicate legal or policy arguments raised by others in this proceeding. It offers "a unique perspective or specific information that can assist ... beyond what the parties can provide." *Voices for Choices v. Illinois Bell Telephone Co.*, 339 F.3d 542, 545 (7<sup>TH</sup> Cir. 2003).

Accordingly, the proposed *amici* respectfully request that the Court grant leave to file the attached brief.<sup>2</sup>

Respectfully submitted,

/s/  
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<sup>2</sup> No party or party's counsel authored the attached brief in whole or in part. No person other than the *amici* or its counsel contributed money to fund the preparation or submission of the brief